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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DEBTORS' OBJECTION TO THE EX  
PARTE MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO B.L.R. 9006-1  
REQUESTING ORDER SHORTENING  
TIME FOR HEARING ON MOTION FOR  
ENTRY OF AN ORDER  
DETERMINING PROCEDURES FOR  
PRESERVING JURY TRIAL RIGHTS**

Related to Dkt. Nos. 3479 and 3481

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”) as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby submit this objection to the *Ex Parte Motion of the Official Committee of Tort Claimants* (the “**TCC**”) Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Motion for Entry of an Order Determining Procedures For Preserving Jury Trial Rights, Dkt. No. 3481 (the “**Motion to Shorten**”).

On August 8, 2019, the TCC filed a Motion for Entry of an Order Determining Procedures for Preserving Jury Trial Rights, Dkt. No. 3479 (the “**Jury Trial Motion**”). On that same date, the TCC filed its Motion to Shorten, seeking to have its Jury Trial Motion heard on August 14, 2019, *i.e.*, on six days’ notice. As the Court knows, there are already substantial issues set to be heard on August 14; issues that require the Debtors’—as well as the Court’s—immediate attention. The TCC sets forth only one justification for its requested highly expedited timeframe: if the Court requires the TCC to adhere to Bankruptcy Local Rule 9014-1(c)(2) and set their Jury Trial motion for hearing on September 10, 2019, their motion will be heard “only *41 days* prior to the [October 21, 2019] bar date in these cases.” *See* Motion to Shorten at 3-4 (emphasis added). Simply stated, there is no reason to grant the Motion to Shorten.

As an initial matter, a September 10, 2019 hearing will provide more than sufficient time for filing proofs of claim by any claimants who are “wait[ing] until confirmation of preservation of their jury trial rights to file their claims.” Motion to Shorten at 3. Also, missing from the Motion to Shorten is any explanation as to why, if the relief the TCC seeks in their Jury Trial Motion is truly so urgent, the TCC did not seek such relief earlier, having been aware of the Debtors’ motion to establish a bar date since it was filed on May 1, 2019. *See* Dkt. No. 1784.

In addition, the parties may very well be able to resolve the issues presented in the Jury Trial Motion without the Court’s involvement, if provided the time contemplated by the Court’s Local Rules. For example, one such issue can be resolved now: the Debtors do not contend—and never contended—that the submission of claims data and information to the BrownGreer database waives

any jury trial rights that may exist with respect to wrongful death or personal injury claims.<sup>1</sup> And while the Debtors similarly may not take issue with certain other aspects of the relief sought by the TCC, they need sufficient time to thoughtfully consider whether such relief is appropriate and whether and how any related issues should be addressed and the Debtors' rights preserved in any order to be issued.

For the reasons stated herein, the Court should deny the Motion to Shorten and set the hearing on the Jury Trial Motion for September 10, 2019, pursuant to Bankruptcy Local Rule 9014-1(c)(2).

Dated: August 11, 2019

**WEIL, GOTSHAL & MANGES LLP**

**KELLER & BENVENUTTI LLP**

By: /s/ Theodore E. Tsekerides  
Theodore E. Tsekerides

*Attorneys for Debtors and Debtors in Possession*

<sup>1</sup> The TCC provides no authority even suggesting that claimants would in any way risk waiver of their jury trial rights by simply providing information to interested parties in these Chapter 11 Cases, and this purported concern should not delay the Debtors' access to the BrownGreer database that is long overdue.